

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,
Plaintiff/Counter-Defendant,

v.

HONORSOCIETY.ORG INC.,
Defendant/Counter-Plaintiff

HONOR SOCIETY FOUNDATION, INC.,
Defendant.

Civil Action No. 3:22-cv-00208-CWR-RPM

HONORSOCIETY.ORG INC.,
Defendant/Counter-Plaintiff/Third-
Party Plaintiff

v.

LYNN TINCHER-LADNER,
Third-Party Defendant.

**HONORSOCIETY.ORG INC. AND HONOR SOCIETY FOUNDATION, INC.'S
RESPONSE TO PHI THETA KAPPA HONOR SOCIETY'S MOTION
FOR SUMMARY JUDGMENT**

HonorSociety.org Inc. and Honor Society Foundation, Inc. (together, “HonorSociety”) file this Response to Phi Theta Kappa Honor Society’s Motion for Summary Judgment, filed February 14, 2025 at Docket No. 425, based on the following:

1. HonorSociety adopts and incorporates by reference, as if fully and completely set forth herein, the arguments and authorities set forth in HonorSociety’s memorandum filed concurrently herewith.
2. In further support of its response, HonorSociety attaches herewith the Declaration of Derek Linke and exhibits thereto.

HonorSociety respectfully requests that the Court deny PTK’s motion.

Dated: March 7, 2025

Respectfully Submitted,

s/ Derek Linke

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Attorneys for Defendant, Counter-Claimant, and
Third-Party Plaintiff HonorSociety.org Inc. and
Defendant Honor Society Foundation, Inc.

Certificate of Service

I hereby certify that on March 7, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. Participants in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

Executed this 7th day of March 2025

s/Derek Linke
Derek Linke